

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WISCONSIN**

In re:

MICHAEL J. DINDORF,

Case No.: 12-35841-SVK

Debtor.

Chapter 11 Proceedings

**STIPULATION REGARDING DEBTOR'S MOTION TO (I) REOPEN THE CASE, (II)
FOR SANCTIONS/CONTEMPT AGAINST CERTAIN LENDERS, (III) FOR AN
ORDER DIRECTING CERTAIN LENDERS TO COMPLY WITH THE PLAN**

Michael J. Dindorf (the "Reorganized Debtor"), by his attorneys, Kerkman & Dunn, and Ditech Financial ("Ditech"), by its attorneys, J. Peterman Legal Group Ltd., stipulate and agree as follows:

1. On March 30, 2016, the Reorganized Debtor filed a motion requesting that the Court find certain Lenders in contempt for failing to comply with the Reorganized Debtor's Plan, and requesting an order directing and requiring the Lenders to comply with the terms of the Plan (the "Motion").
2. A hearing on the Motion was held on April 19, 2016. The Court entered an order reopening the case, and directing that certain Lenders, including Ditech, adjust their internal records and provide the Debtor with evidence that their loan statements comply with the terms of the Plan (the "Order").
3. The Court scheduled an evidentiary hearing on the Debtor's request for sanctions

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for August 18, 2016.

4. In order to resolve the Motion, Ditech agrees that within thirty (30) days of the Court entering an order approving this Stipulation, it will (i) make an agreed upon confidential settlement payment to the Reorganized Debtor, and (ii) provide the Reorganized Debtor with documentation that his loan has been properly booked and complies with the Plan.

5. The Reorganized Debtor agrees that upon Ditech complying with the provisions of this Stipulation, Ditech will be dismissed from the Motion, and will not be subject to any further sanctions, fees or costs under the Motion.

6. If Ditech fails to comply with the terms of this Stipulation, the Reorganized Debtor reserves the right to continue pursuing Ditech under the Motion.

7. The parties request that the Court enter an order approving the terms of this Stipulation.

Dated: August 9, 2016.

Kerkman & Dunn

By: /s/ David J. Espin
David J. Espin

Attorneys for the Reorganized Debtor

J. Peterman Legal Group Ltd.

By: /s/ Krysta L. Kerr
Krysta L. Kerr

Attorneys for Ditech